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**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	:	:
Ellen Grant	:	Case No. 08-36589
	:	Chapter 7
Debtor	:	

Ellen Grant	:	Adv. Pro. No. 09-03042
Plaintiff,	:	
v.	:	
American Express Financial Corporation	:	
Defendant	:	

**ANSWER TO CORE ADVERSARY PROCEEDING COMPLAINT FOR CIVIL
CONTEMPT AND DAMAGES AND INJUNCTIVE RELIEF**

American Express Financial Corporation, (hereinafter collectively “American Express”),
hereby answers the Complaint and in support thereof avers as follows:

I. INTRODUCTION

Admitted.

II. JURISDICTION AND VENUE

1. Admitted.

III. PARTIES

2. Admitted.

3. Admitted.

IV. FACTUAL ALLEGATIONS

4. Admitted.

5. After reasonable investigation, American Express lacks the knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, and therefore, denies same.

6. After reasonable investigation, American Express lacks the knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, and therefore, denies same.

7. After reasonable investigation, American Express lacks the knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, and therefore, denies same.

8. After reasonable investigation, American Express lacks the knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, and therefore, denies same.

9. After reasonable investigation, American Express lacks the knowledge or information sufficient to form a belief as the truth of the allegations of this paragraph, and therefore, denies same.

10. After reasonable investigation, American Express lacks the knowledge or information sufficient to form a belief as the truth of the allegations of this paragraph, and therefore, denies same.

11. After reasonable investigation, American Express lacks the knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, and therefore, denies same.

12. After reasonable investigation, American Express lacks the knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, and therefore, denies same.

V. DAMAGES

13. After reasonable investigation, American Express lacks the knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, and therefore, denies same.

14. After reasonable investigation, American Express lacks the knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, and therefore, denies same.

15. After reasonable investigation, American Express lacks the knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, and therefore, denies same.

16. After reasonable investigation, American Express lacks the knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, and therefore, denies same.

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33. After reasonable investigation, American Express lacks the knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, and therefore, denies same.

34. After reasonable investigation, American Express lacks the knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, and therefore, denies same.

WHEREFORE, Defendant American Express Financial Company prays this Honorable Court for judgment in its favor dismissing Complaint and awarding such further relief as the Court deems just.

Respectfully submitted,
STROMBERG & ASSOCIATES, P.C.

By: /s/ Mark Stromberg
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And

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